

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

IN RE:

ADETUTU AKINKUOWO
MOROLAYO AKINKUOWO
Debtors

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CASE NO. 12-29487

CHAPTER 13

DEBTORS' MOTION TO MODIFY CONFIRMED PLAN

Adetutu and Morolayo Akinkuowo ("Debtors"), by and through their undersigned attorney, file this *Motion to Modify Confirmed Plan*, and in support thereof would show the Court as follows:

1. The Debtors filed a voluntary petition for relief under Chapter 13 on October 26, 2012. The Chapter 13 Plan (the "Plan") was confirmed by Order dated January 17, 2013.
2. The Plan provides for payments under the following terms:
\$ 465.00 per month for 60 months
3. Under the Plan, America's Servicing Company will be paid pre-petition arrears totaling \$23,583.
4. U.S. Bank, National Association, as Trustee c/o America's Servicing Company ("ASC") filed claim no. 12 on March 6, 2012. It claims pre-petition arrears totaling \$25,347.16.
5. The purpose of the modified plan is to provide for the increase in the pre-petition arrears claimed by ASC, as compared with the Plan.
6. The modified plan provides for approximately the same distribution to all other creditors.
7. Under the modified plan, the Debtors will make payments of \$465.00 for 5 months and \$501.00 for 55 months, for a total of 60 months. (*see* Exhibit "A").

Wherefore, Debtors ask that the Court enter an Order Modifying Debtors' Chapter 13 Plan, and for such other and further relief as this Court deems just and proper.

RESPECTFULLY SUBMITTED,

/s/ Alon J. Nager, Esq.

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Counsel for the Debtors

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of April 2013, I sent a copy of the Motion to Modify Confirmed Plan and Exhibit A to the following by first class mail postage prepaid, or by electronic means if applicable:

Alon J. Nager, on behalf of the Debtors
Chapter 13 Trustee

/s/ Alon J. Nager
Alon J. Nager, Esq.